



The proposed Settlement Agreement is fair and reasonable, and will provide the Receivership Estate with \$28 million dollars. As the United State notes, the settlement has taken several years to achieve, and it should not be delayed any further. The United States, like all other parties and interested parties, will have had two weeks to review the materials in the Receiver's motion – which is only one week less than the normal briefing schedule. L.R. 7.2. Furthermore, the public has been informed for the last several months that post-mediation settlement discussions were ongoing between the parties. (*See Receiver's Reports*, Docs. 526, p. 3; 527, p. 3; Doc. 528, p. 3). It is not a secret that the Receiver was working to settle the Receiver's Claims the last several months, and there has been ample time for any interested parties to make any concerns known to the Receiver.<sup>1</sup>

For the reasons above, the Receiver moves the Court to deny the United States' Motion for Extension.

Respectfully submitted this the 30th day of December, 2022.

/s/ James F. Banter  
James F. Banter  
Counsel for the Receiver

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<sup>1</sup> The undersigned counsel has made himself available several times this week for calls and emails with counsel for the United States to discuss the Settlement Agreement and answer any questions concerning the terms of the same.

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy on the following parties via U.S. Mail or electronically through the CM/ECF system on this the 30th day of December, 2022.

/s/ James F. Banter  
James F. Banter  
Counsel for the Receiver